

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PENNSYLVANIA GENERAL ENERGY)	
COMPANY, LLC,)	
)	Civil Action No. 14-cv-209 ERIE
Plaintiff)	
)	Magistrate Judge Susan Paradise Baxter
v.)	
)	
GRANT TOWNSHIP,)	
)	
Defendant.)	

PROPOSED ORDER

THIS ____ day of _____, 2019, the Court **GRANTS** the Motion for Approval of Alternative Security and Stay of Execution of Sanctions Order and enters the following **ORDER**:

1. Enforcement of the Order of Sanctions of January 5, 2018 (Doc. 290) is stayed pending full resolution of all appeals pertaining to the Order.
2. As a condition of the stay:
 - a. The sum of \$52,000.00 shall be escrowed by or on behalf of Thomas A. Linzey and Elizabeth Dunne (collectively "Sanctioned Lawyers") in an interest-bearing account with a financial institution.
 - b. The escrowed sum shall be held by the financial institution until further Order of Court.
 - c. The Sanctioned Lawyers shall pay all administrative costs associated with setting up and maintaining the funds in escrow such that the total sum of \$52,000.00 is not reduced in any way during the appeal.
 - d. The Sanctioned Lawyers will provide PGE with proof of such escrow account and the amount held in said account within 14 calendar days of this Order.

J.